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CLERK AT SEATTLE
U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEP

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

YUE WU,

Defendant.

NO. CR14-306RAJ

GOVERNMENT'S MOTION FOR
DETENTION

The United States moves for pretrial detention of the defendant, pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because this case involves (check all that apply):

☐ Crime of violence (18 U.S.C. § 3156)

☐ Crime of Terrorism (18 U.S.C. § 2332b(g)(5)(B)) with a maximum sentence of ten years or more

☐ Crime with a maximum sentence of life imprisonment or death

☐ Drug offense with a maximum sentence of ten years or more

1 — Felony offense and defendant has two prior convictions in the four categories
2 above, or two State convictions that would otherwise fall within these four
3 categories if federal jurisdiction had existed.

4 — Felony offense involving a minor victim other than a crime of violence

5 — Felony offense, other than a crime of violence, involving possession or use of a
6 firearm, destructive device (as those terms are defined in 18 U.S.C. § 921), or
7 any other dangerous weapon

8 — Felony offense other than a crime of violence that involves a failure to register
9 as a Sex Offender (18 U.S.C. § 2250)

10 X Serious risk the Defendants will flee

11 X Serious risk of obstruction of justice, including intimidation of a prospective
12 witness or juror

13 **2. Reason for Detention.** The Court should detain the Defendant because there
14 are no conditions of release which will reasonably assure (check one or both):

15 X Defendant's appearance as required

16 X Safety of any other person and the community

17
18 **3. Rebuttable Presumption.** The United States *will not* invoke the rebuttable
19 presumption against Defendant under § 3142(e). The presumption applies because:

20
21 — Probable cause to believe defendant committed offense within five years of
22 release following conviction for a "qualifying offense" committed while on
23 pretrial release.

24 — Probable cause to believe defendant committed drug offense with a maximum
25 sentence of ten years or more

26 — Probable cause to believe Defendants committed a violation of one of the
27 following offenses: 18 U.S.C. §§ 924(c), 956 (conspiracy to murder or kidnap),
28 2332b (act of terrorism), 2332b(g)(5)(B) (crime of terrorism)

1 — Probable cause to believe defendant committed an offense involving a victim
2 under the age of 18 under 18 U.S.C. §§ 1591, 2241, 2242, 2244(a)(1), 2245,
3 2251, 2251A, 2252(a)(1) through 2252(a)(3), 2252A(a)(1) through
4 2252A(a)(4), 2260, 2421, 2422, 2423 or 2425.

5 **4. Time for Detention Hearing.** The United States requests that the Court
6 conduct the detention hearing:

7 X At the initial appearance

8 — After continuance of _____ days.

9 DATED this 13th day of November, 2014.

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11 Respectfully submitted,
12 ANNETTE L. HAYES
13 Acting United States Attorney

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15 TODD GREENBERG
16 Assistant United States Attorney
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